

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:	)	Case No:	17-08220
Kimberly Wallace	)		
Debtor	)	Chapter:	Chapter 13
	)		
	)	Judge:	LaShonda A. Hunt

NOTICE OF MOTION

To: Kimberly Wallace, 9443 Sumac St., Unit D, Des Plaines, IL, 60016  
Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604  
Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604  
SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on **April 15, 2019 at 9:30 a.m.** I shall appear before the Honorable Judge **LaShonda A. Hunt** at 219 S. Dearborn St. # 719, Chicago IL 60604 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto.

By: /s/ Dale Riley  
Dale Riley

CERTIFICATE OF SERVICE

I, Dale Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 3/25/2019.

By: /s/Dale Riley  
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
(Ph): 312.332.1800 (Fax): 877.247.1960

Arrow Financial Bankruptcy dept 20131 Network Place Chicago IL 60673	IDES Bankruptcy Department 33 S. State Street 8th Floor Chicago IL 60603	Robert J Adams & Associates C/o David J Axelrod & Assoc 1448 Old Skokie Rd Suite C Highland Park IL 60035
AT&T ATTN: Bankruptcy Dept 208 S Akard St Dallas TX 75202	Illinois Title Loans, Inc. Bankruptcy Department 10258 S. Halsted Chicago IL 60628	Secretary of State Attn: Safety & Financial Resp 2701 S. Dirksen Pkwy. Springfield IL 62723
Balsamo YONG SUK C/O Keynote Consulting 220 W Campus Dr Ste 102 Arlington Heights IL 60004	Kindercare Learning Centers C/O I C System INC Po Box 64378 Saint Paul MN 55164	SLM Financial Corporation Bankruptcy Department PO Box 4400 Wilkes-Barre PA 18773-4400
Ben Franklin Auto Bankruptcy dept 6100 N Clark Chicago IL 60660	National Credit Adjusters Llc Attn: Bankruptcy Dept. 327 W 4th Ave Hutchinson KS 67501	T-Mobile Bankruptcy Department PO Box 742596 Cincinnati OH 45274-2596
City of Chicago - Dept of Revenue Bankruptcy Department 121 N. LaSalle St Room 107 Chicago IL 60602	Blitt and Gaines, PC Bankruptcy Dept. 661 Glenn Ave. Wheeling IL 60090	TCF Bank IL C/o RGS Financial 1700 Jay Ell Drive Ste 200 Richardson TX 75081
Arnold Scott Harris PC Bankruptcy Dept. 111 W Jackson Blvd Ste 600 Chicago IL 60604	National Louis University Attn: Bankruptcy Dept. 122 S Michigan Ave Chicago IL 60603	U S DEPT OF ED/GSL/ATL Attn: Bankruptcy Dept. Po Box 4222 Iowa City IA 52244
Markoff Law LLC Bankruptcy Dept 29 N Wacker Dr. Ste. 550 Chicago IL 60606	Rooney Law Firm PC Bankruptcy Dept PO Box 57359 Chicago IL 60657	US Cellular Bankruptcy Department PO Box 7835 Madison WI 53707-7835
City of Rolling Meadows Attn: Bankruptcy Dept. 3600 Kirchoff Rd. Rolling Meadows IL 60008	Clerk, First Mun Div 2015-M1-103626 50 W. Washington St., Rm. 1001 Chicago IL 60602	Village of Palatine C/o Armor Systems 1700 Kiefer Dr Ste 1 Zion IL 60099
Armor Systems Co. Bankruptcy Dept. 1700 Kieffer Dr., Ste. 1 Zion IL 60099	Navient Attn: Bankruptcy Dept. Po Box 9500 Wilkes Barre PA 18773	Wheels of Chicago Bankruptcy Dept. 6229 N. Western Ave Chicago IL 60659
Consumer Financial Services Bankruptcy Dept 300 S Green Bay Rd Waukegan IL 60085	Navient Solutions INC Attn: Bankruptcy Dept. 11100 Usa Pkwy Fishers IN 46037	
Consumer Financial SVC Attn: Bankruptcy Dept. 10431 Us Highway 19 Port Richey FL 34668	Nicor Gas Bankruptcy Department PO Box 549 Aurora IL 60507	
ECMC Bankruptcy Department PO Box 75848, Lockbox 8682 Saint Paul MN 55175	Receivable Management Bankruptcy Department 3348 Ridge Rd. Lansing IL 60438	

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FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b>  <b>Kimberly Wallace</b> <b>Debtor</b>	) ) ) ) )	<b>Case No: 17-08220</b>  <b>Chapter: Chapter 13</b>  <b>Judge: LaShonda A. Hunt</b>
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**MOTION TO MODIFY CONFIRMED PLAN**

NOW COMES the Debtor, Ms. Kimberly Wallace (the “Debtor”), by and through her attorneys, Geraci Law L.L.C., to present her **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtor filed her Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 03/16/2017.
3. The Debtor’s plan was confirmed by the Court on 06/26/2017, including a provision requiring the Debtor to turn her federal tax refunds in excess of \$1,200 over to the Trustee as additional payments into the plan.
4. The Debtor anticipates receiving a refund of \$8,678 for tax year 2018, of which \$7,478 is due to the Trustee.
5. The Debtor seeks to purchase a vehicle for \$5,000 in cash so that she can avoid a lengthy financing agreement, and needs to repay \$722.72 in vehicle rental expenses that she has incurred while she has been without a vehicle of her own. She also would like to buy \$2,000 worth of furniture for her home. The Debtor is unable to afford these expenses while also maintaining her Chapter 13 plan payments without using her tax refund.

6. The Debtor seeks to use the remainder of her tax refund to catch up on miscellaneous household expenses on which she has fallen behind but is able to repay these funds by deferring them to the end of the plan term.
7. For the reasons stated above, it is necessary for the successful completion of the Debtor's plan to permit the Debtor to keep \$7,722.27 of her 2018 tax refund and to defer the remaining arrears to the end of the plan term.

WHEREFORE THE DEBTOR, Ms. Kimberly Wallace, respectfully requests this Honorable Court enter an order:

1. Permitting the Debtor to keep \$7,722.27 of her 2018 tax refund,
2. Deferring arrears to the end of the plan term,
3. Any other relief the court deems proper.

By: /s/ Dale Riley  
Dale Riley

**Attorneys for the Debtor**

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960